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 Attorneys for Defendant
 UNITED STATES DISTRICT COURT
 DISTRICT OF MASSACHUSETTS

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LUANN P. GOULD,	:	<u>ORIGINAL FILED VIA ECF</u>
	:	
Plaintiff,	:	
	:	05 CV 11118 (PBS)
– against –	:	DEFENDANT’S NOTICE OF
	:	MOTION FOR SUMMARY
LUCENT TECHNOLOGIES, INC.,	:	<u>JUDGMENT</u>
	:	
Defendant.	:	
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PLEASE TAKE NOTICE that, upon the annexed Rule 56.1 Statement of Undisputed Material Facts, the supporting Affirmation of Robyn Ruderman, the annexed Affidavits of Margaret Blumer, Katherine Campbell and Brian Ahern, the accompanying annexed exhibits and Memorandum of Law, and all of the pleadings and proceedings had herein, Defendant will move this Court, before the Honorable Patti B. Saris, at the United States Courthouse, 1 Courthouse Way, Suite 2300, Boston, Massachusetts 02210, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment to Defendant on the grounds that there are no genuine issues of material fact in need of trial, and that Defendant is entitled to judgment as a matter of law.

The basis for this motion, which is set forth more fully in the accompanying Memorandum of Law, is that there is no genuine issue of material fact.

Pursuant to Local Rule 7.1, the undersigned counsel for Defendant hereby certifies that she has attempted to confer with Plaintiff's counsel in a good faith attempt to resolve or narrow the issues presented in this motion.

WHEREFORE, Defendant respectfully requests that the Court: (i) grant its motion for summary judgment and dismiss Plaintiff's Complaint in its entirety with prejudice; and (ii) grant it such other and further relief that the Court deems just and appropriate.

Dated: August 18, 2006

EPSTEIN BECKER & GREEN, P.C.

By: s/Robyn Ruderman
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